



U.S. Department of Justice

United States Attorney
Southern District of New York

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #: _____
DATE FILED: 01/28/20

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

January 27, 2020

By ECF

The Honorable Gregory H. Woods
United States District Judge
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007

MEMORANDUM ENDORSED

Re: *United States v. Jonathan Perez, 16 Cr. 656 (GHW)*
 Jonathan Perez v. United States, 19 Civ. 9129 (GHW)

Dear Judge Woods:

The Government writes to respectfully request an extension for its response in the above-captioned case, currently scheduled for January 31, 2020. Now that petitioner Jonathan Perez has filed the requisite privilege waiver, additional time is needed for the Government to confer with Perez's former counsel and to obtain records and statements from counsel pertinent to Perez's pending petition. These steps are necessary to permit the Government to prepare its response to the petition.

As a result, the Government respectfully requests that the Court extend the deadline for the Government's response to Perez's petition until February 21, 2020, in order to permit the Government and former counsel additional time to pursue these steps.

Respectfully submitted,

GEOFFREY S. BERMAN
United States Attorney

By:

/s/
Rebekah Donaleski
Kimberly Ravener
Jilan J. Kamal
Assistant United States Attorneys
(212) 637-2192

cc: Jonathan Perez (*pro se*, by mail)

Application granted. The Government is directed to file its answer to Mr. Perez's petition by no later than February 21, 2020. Mr. Perez is directed to file his response to the Government's answer by no later than March 27, 2020.

The Clerk of Court is directed to send a copy of this order to Mr. Perez by first-class and certified mail.

SO ORDERED.

Dated: January 28, 2020
New York, New York


GREGORY H. WOODS
United States District Judge